

# **Third-party assessment accordance to VO (EU) 2017/821 conflict minerals**



***CRONIMET***  
*Raw Materials GmbH*



Third-party conformity assessment accordance to VO (EU) 2017/821 **conflict minerals**  
Regulation (EU) 2017/821 (tantalum, tin, tungsten, and gold)

<b>company (union importers):</b>	CRONIMET Raw Materials GmbH (CRRM) Südbeckenstraße 22 76189 Karlsruhe
<b>other locations:</b>	Symphersstraße 98 47138 Duisburg
<b>assessed und locations and facilities</b>	Karlsruhe and Duisburg (inclusive the grinding plant) within the integrated management audit accordance to 9001/14001/45001
<b>Which companies inside the group introduce 3TG in which area of validity?</b>	Only Cronimet Raw Materials inside the Cronimet group has to fulfill the requirements of the Regulation VO (EU) conflict minerals. In concrete terms they import exclusively Ferro-Wolfram and Ferrosiliciumwolfram.  area of validity: see below
<b>Project number:</b>	KR 20221012
<b>Reference period:</b>	calendar year 2021
<b>Area of validity (definition of concern/ affected kinds of products or services/ Amount per year: tin, tantalum, tungsten, its mineral ores, gold):</b>	trade in ferroalloys (ferrotungsten + ferrosiliciumtungsten/ 102.000 kg in 2021)
<b>Board of Management:</b>	Mr. Philipp Kistner (designated person accordance to article 4 VO EU 2017/821), Mr. Oliver Kleinhempel
<b>Representatives:</b>	Ms. Kutscher (Head of MSU-Group), Mr. Rettig (Business Controlling, designated person accordance to article 4 VO EU 2017/821)
<b>QSHE-manual:</b>	IHB Integrated Handbook 2022-07-26
<b>Team lead, inspector inspector</b>	Mr. Martin Busch Mr. Wolfgang Lang
<b>Date of inspection:</b>	2022-11-17 and 2022-11-18

## Summary assessment / goal of the inspection

In the context of the inspection the inspectors observe all activities, processes and systems of the union importer, which are able to fulfill the requirements of (EU) 2017/821 conflict minerals Regulation (EU) 2017/821 (tantalum, tin, tungsten, and gold), including the management system, the risk management and the responsible disclosure accordance to the regulation.

**The target is to determine if the union importer`s processes are comply with the requirements of articles 4 to 7 of (EU) 2017/821 conflict minerals (due diligence in the supply chain).**

In the context of the inspection the inspectors observe all questions in the business departments. While inspecting the company could provide evidence of application the requirements. The application of the implementation could be inspected in practice through interviews and observations.

The area of validity could be confirmed.

All responsible people were present and the inspection could be performed completely.

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Non-conformities are summarized at the end of this report.

Recommendations to improve the due diligence in the supply chain are also summarized at the end of this report.

The inspection is comply with the OECD Guidelines due diligence in supply chain (independence, competence and accountability).

Accordance to the inspection`s random character we point out that could be non-conformities in the company which not recognized while inspecting. The inspector`s formulations do not disengage the company, to fulfill the requirements constantly.

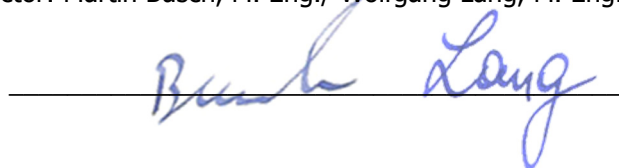
## Result of the inspection

The union importer`s processes are comply with the requirements of articles 4 to 7 of (EU) 2017/821 conflict minerals (due diligence in the supply chain).

date: 2022-12-08

teamlead/inspector: Martin Busch, M. Eng./ Wolfgang Lang, M. Eng.

Unterschrift:

A handwritten signature in blue ink, appearing to read 'Busch Lang', written over a horizontal line.